UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

Criminal No. 2:23-cr-20644

v.

Hon. Gershwin A. Drain

BRUCE F. ISRAEL,

Defendant.

MOTION TO SEAL UNITED STATES' <u>SENTENCING MEMORANDUM EXHIBITS</u>

The United States, by its undersigned attorneys, respectfully requests that certain exhibits to the United States' Sentencing Memorandum be sealed until further Order of the Court because of the sensitive nature of the exhibits, which contain non-public investigative information such as the identity of unindicted coconspirators and victims. The United States has conferred with counsel for the Defendant, and he takes no position on this motion and leaves it to the discretion of the Court.

Respectfully submitted,

/s/ Ruben Martinez, Jr.

Ruben Martinez, Jr. (TX 24052278)

Allison M. Gorsuch (IL 6329734)

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Trial Attorneys

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Dated: June 17, 2025

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/ Ruben Martinez, Jr.

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Dated: June 17, 2025